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10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 SUSAN HOY as Special Administrator of the  
ESTATE OF A.D.J., a male minor (November  
13 17, 2003 - April 25, 2017), and SUSAN HOY as  
Guardian Ad Litem of A.B.J., a female minor,  
14 (December 21, 2005), DIJONAY THOMAS,  
individually and as heir to A.D.J.,

15 Plaintiffs,

16 v.

17 PAUL D. JONES, individually; CAROLE  
FALCONE, individually and in her official  
18 capacity; PAULA HAMMACK, individually and  
in her official capacity; COUNTY OF CLARK, a  
19 political subdivision of the State of Nevada;  
DOES I-X, individuals; and ROE  
20 CORPORATIONS I-X; DOE CLARK  
COUNTY DEPARTMENT OF FAMILY  
21 SERVICES EMPLOYEES XI-XXX;  
individually and in their official capacities;  
22 BOULDER II DE, LLC, a Delaware Limited  
Liability Company dba SIEGEL SUITES  
23 BOULDER 2; THE SIEGEL GROUP  
NEVADA, INC., A Domestic Corporation, dba  
24 THE SIEGEL GROUP; BOULDER II LV  
HOLDINGS, LLC, A Nevada Limited Liability  
25 Company; DOE EMPLOYEE SIEGEL SUITES  
I-X,

26 Defendants.  
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CASE NO.: 2:18-cv-01403-RFB-GWF

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE RESPONSE  
TO DEFENDANTS COUNTY OF  
CLARK, CAROLE FALCONE AND  
PAULA HAMMACK'S MOTION FOR  
SUMMARY JUDMENT**

**(FIRST REQUEST)**

COMES NOW SUSAN HOY as Special Administrator of the ESTATE OF A.D.J., a male  
minor 17, 2003 - April 25, 2017), and SUSAN HOY as Guardian Ad Litem of A.B.J., a female



1 minor, (December 21, 2005), DIJONAY THOMAS, individually and as heir to A.D.J. and C  
2 CAROLE FALCONE, individually and in her official capacity; PAULA HAMMACK, individually  
3 and in her official capacity; COUNTY OF CLARK, a political subdivision of the State of Nevada;  
4 by and through their respective counsel of record and hereby stipulate to extend the time for  
5 Plaintiffs to file their response to *Defendants, County of Clark, Carole Falcone and Paula*  
6 *Hammack's Motion for Summary Judgment (ECF No.: 41.)*  
7

8 Plaintiffs' response is currently due on August 23, 2019. Plaintiffs' counsel was in a motor  
9 vehicle crash on August 20, 2019. Therefore, Plaintiffs have good cause to request an extension of  
10 time until Friday, August 30, 2019, seven (7) days after the response would otherwise be due.

11 Defendants' Reply to Plaintiffs' response will be due on 9/20/19.

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1 This is Plaintiffs' first request for an extension and this stipulation is submitted in good faith  
2 without the purpose of undue delay.

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4 Dated this 22<sup>nd</sup> day of August 2019.

Dated this 22<sup>nd</sup> day of August 2019.

5 GANZ & HAUF

OLSON, CANNON, GORMLEY,  
ANGULO & STOBERSKI

6  
7 */s/ Marjorie Hauf, Esq.*

*/s/ Felicia Galati, Esq.*

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Attorney for Plaintiffs

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13 IT IS SO ORDERED.

14 Dated this 23 day of August, 2019.

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17 UNITED STATES MAGISTRATE JUDGE